

U.S. Department of Justice

United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

March 24, 2025

BY ECF

The Honorable Alvin K. Hellerstein United States District Judge Southern District of New York 500 Pearl Streets New York, New York 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

The Government respectfully writes in response to several pending defense motions.

I. Javice's Motion To Unredact Amar's Ex Parte Conference In Full (Dkt. 332)

To the extent the Javice's motion for severance is not already moot given the Court's repeated denial of such motions, the Government opposes severance for the reasons previously stated. *See* Dkt. 216, 298.

With respect to Javice's request to unseal in full the transcript of the Court's *ex parte* conference with Amar regarding Amar's defense held on January 23, 2025, the Government takes no position.

II. Amar's Motion To Admit The "Huge Mislabel" Slack (Dkt. 340)

The Government opposes Amar's March 18, 2025 motion to admit GX 802-22, a Slack chat between from July 7, 2021, involving Amar, Javice, and Matt Glazer. (Dkt. 340). Amar seeks to introduce the chat to show that, while on a call with LionTree regarding the preparation of a PowerPoint presentation for Capital One that Amar would deliver the following day, Amar sent an internal slack message to Javice and Amar stating "that's a huge mislabel." The defendant seeks to connect this slack to a mislabeled spreadsheet in the Capital One diligence data room concerning Frank's website impressions. Specifically, the spreadsheet was incorrectly labeled as depicting website visitor volume when, in fact, it showed website impression volume. Nevertheless, during the July 8, 2021 meeting, Amar made fraudulent representations concerning the number of Frank users who had completed a FAFSA in furtherance of the conspiracy. See GX 3040.

As an initial matter, this internal slack among Javice, Amar, and Glazer constitutes

inadmissible hearsay. To the extent Amar seeks to offer this document for a non-hearsay purpose, it should be precluded under Rule 403. First, the distinction between website visitors (i.e., an individual who clicks on the Frank webpage) versus website impressions (i.e., where Frank showed up in internet search results)—and any "correction" of this distinction"—was far from central to the Frank deal, as testified to by witnesses from Capital One and J.P. Morgan. Nor is it central to the charged fraud, which concerns the defendants' representations concerning the number of users who signed up for accounts and started FAFSA applications—which was critical to the Frank deal. Second, even if Amar identified mislabeled data regarding website impressions in his internal communications with Javice and Glazer, Amar nevertheless persisted in the fraud by misrepresenting the number of Frank's "FAFSA Completions" the following day during the July 8, 2021 meeting with Capital One. Evidence that Amar identified mislabeled impression data in an internal slack communication when no potential investor was present (but Glazer, the General Counsel, was), is a sideshow that could easily confuse and distract the jury from issues that are properly before them. Likewise, as explained in Javice's opposition to Amar's motion, Dkt. 344, Amar's efforts to emphasize Javice's intent to mislabel impressions and Amar's purported intent to fix mislabeled impressions—even though Amar and Javice made fraudulent misrepresentations to Capital One the next day—is a transparent attempt by Amar to distance himself from the lies that are actually at issue, which he himself told, by misdirecting the jury. The Court should deny Amar's motion.

III. Javice's Letter Regarding Attorney Fees (Dkt. 341)

In her letter dated March 18, 2025, Javice claims—without seeking any relief—that she has suffered prejudice because the Court prevented her counsel from confronting certain Government witnesses on JPMC's payment of legal fees for those witnesses. To the extent this letter constitutes a motion for relief, it should be denied for the same reasons that the Court previously precluded this line of cross-examination. See Tr. 523-527. As an initial matter, Javice's counsel has vigorously cross-examined Government witnesses throughout this trial and cannot credibly argue that her rights under the Confrontation Clause have been curtailed because she was not permitted to cross-examine Government witnesses as to who paid their legal fees. Furthermore, as the Government stated in its prior opposition on this issue (Dkt. 285), crossexamination concerning JPMC's payment of legal fees is of minimal probative value: it is routine for employers, such as JPMC, to pay legal fees and/or provide counsel for its employees and former employees in matters arising from their employment. What's more, evidence of JPMC's payment of government witness legal fees would be incomplete and misleading because JPMC is also paying the defendants' legal fees. Allowing Javice to cross-examine Government witnesses on JPMC's payment of legal fees would, therefore, open the door for the Government to elicit how JPMC is paying the defendants' legal fees. Accordingly, the Court has properly precluded Javice's counsel from cross-examining Government witnesses on JPMC's payment of legal fees.

IV. Amar's Motion Regarding Jen Wong's Testimony and Exhibits (Dkt. 342)

Amar moves for reconsideration of the Court's rulings regarding Jen Wong's testimony held outside the presence of the jury. (Dkt. 342). There is no basis to reconsider the Court's rulings, and Amar's motion should be denied.

The Court heard testimony, outside the presence of the jury, from Jennifer Wong regarding two exhibits, one offered by the Government (GX 803-14) and one offered by the defense (DX OA 103). The Court ultimately held that neither exhibit could come into evidence before the jury, and Wong's testimony outside the jury has never been put before the jury. *See* Tr. 1285 (the Court stating that "the document" Mr. Cogan sought to offer through Wong the day prior, *i.e.* DX OA 103, "is not admissible"); Tr. 1871 (the Court stating that 801-14 is not admissible). Amar now seeks to cherry pick from Wong's outside-the-jury testimony and present a one-sided version to the jury, including by admitting the defense exhibit that the Court already ruled was inadmissible. Amar's motion for reconsideration should be denied, because Amar has set forth no basis for reconsideration.

First, there is ample testimony in the record regarding Google Analytics, including from Wong herself, as given before the jury. *See* Tr. 1030-35 (Wong generally explaining Google Analytics and how it was used at Frank, including "users," "sessions," "Google Goals," and the type of information collected and stored in Google Analytics, and that Frank could not "augment" the information in Google Analytics), 1037-38 (Wong explaining that, in February 2021, she updated Frank's website to reference 4.25 million students, as requested by Amar, and after confirming that the 4.25 million number was based on Google Analytics users), 1038-40 (Wong discussing a Slack message from Amar regarding using big query to access additional information in Google Analytics), 1082-1111 (Wong discussing, at length, Slack messages with Javice and Amar in which Wong questions the 4,265,085 "FAFSA In Process" number and Amar himself sends a screenshot from Google Analytics and a report from Google Analytics in response).

Second, the Court correctly ruled that the exhibit Amar seeks to offer is inadmissible under Rule 403, because it is incomplete, cumulative, confusing, and would lead to an unnecessary minitrial that would waste time. Indeed, DX OA 103 is actually an attachment to a 176-message Slack conversation between two former Frank employees—neither of whom have testified at trial (and neither of whom was Jen Wong, the witness through whom the defense sought unsuccessfully to offer this exhibit). See Exhibit A (full Slack to which DX OA 103). Wong did not testify that she had any personal knowledge of DX OA 103, or the lengthy Slack conversation from which it originates, because she has none. Admitting DX OA 103 in a vacuum would be confusing and unfairly prejudice the Government's ability to explain what this exhibit is through witness testimony. Yet hearing further testimony regarding this Slack and attachment would add nothing probative to the record and, simply put, would do nothing but waste the jury's time. That is particularly so given the ample testimony regarding Google Analytics, including the fact that during Wong's testimony before the jury, the jury already saw a message from Amar himself in which he shared a comparable screenshot from Google Analytics. See GX 802-71.

V. Javice's Motion Regarding Michael Salve's Testimony (Dkt. 343)

Javice moves to strike the testimony of Michael Salve on two grounds, both of which the Court has already denied. *See* Tr. 2726 (denying motion to preclude Dr. Salve under the Confrontation Caluse); *id.* at 2724-25 (denying motion to preclude Dr. Salve as an expert).

First, Javice's Confrontation Clause argument is baseless. Dr. Salve testified, in short, that he verified the accuracy of two summary charts, and explained the two charts for the jury. The

does not raise any Confrontation Clause issue.

information in the summary charts came entirely from already-admitted Government Exhibits, and Dr. Salve's role was simply to compare the contents of certain data sets that were in evidence. *See* GX 2708, 2709. While Dr. Salve was assisted by others at BRG in certain aspects of his work comparing data files—namely, setting up computer programs to help compare the files line by line, rather than doing a strictly manual comparison, which would have taken an inordinate amount of time—Dr. Salve testified that he personally oversaw the work performed in the first instance by others on his team, personally reviewed that work, and personally validated that work. *See* Tr.

2717, 2741-42; see also, e.g., Tr. 2743 ("I did it by using Excel as well as Microsoft SQL and Python." (emphasis added)). Because Dr. Salve's testimony was based on his personal knowledge and he did not convey any testimonial statements of out-of-court declarants, at all, his testimony

Second, Javice's argument that Dr. Salve was an improperly disclosed expert is likewise meritless. As an initial matter, the Government had disclosed that it was calling a witness from Berkeley Research Group ("BRG") to do these comparisons in December 2024, approximately four months prior to Dr. Salve's testimony, and the defendants received the initial draft of the comparison summary chart approximately seven weeks prior to Dr. Salve's testimony. *See* Tr. 2723. At no point, until the day prior to Dr. Salve's testimony, did the defendants raise any expert witness issue. *See id.* Next, while the Court initially sided with Javice's counsel's arguments that Dr. Salve was offering expert testimony, upon actually hearing from Dr. Salve about the work he performed and the computer programs used to aid that work, the Court revised its ruling and correctly held as follows:

The use by Dr. Salve of Python, UltraEdit, and Microsoft SQL are mechanical aids in the human ability to display, observe, and compare. What a witness would be able to do, under Federal Rule of Evidence 1006, summarizing large exhibits and putting them together in a coherent fashion for the jury to consider, is an appropriate point of admissibility. Essentially that's what this witness is doing. Whatever the means used by the witness to compare, the comparisons, according to Mr. Fergenson, were disclosed several months ago, giving defendants ample time to make their own comparisons, to the extent they wish, using whatever mechanical and automated tools they wished to do so. So it will be unfair to the prosecution to prevent this witness from coming on in the normal course, and I rule that he may do so . . . before the jury.

Tr. 2724-25. The Court's ruling under Rule 1006 was correct, and Javice provides no basis for reconsideration. Further, Javice does not contend that anything Dr. Salve testified to was, in fact, inaccurate or misleading, and thus has failed to identify any prejudice from Dr. Salve's testimony, which accurately summarized information contained in exhibits that were already admitted into evidence.

VI. Javice's Motion Regarding the Frank Website (Dkt. 345)

Javice's motion related to the Frank website, in which Javice seeks a mistrial or a jury instruction regarding missing evidence, is baseless. *See* Dkt. 345.

First, as stated previously in response to an earlier motion to compel from Javice regarding the Frank website, the Government long ago produced whatever archived webpages from the Frank website it had in its possession. See Dkt. 200 (Jan. 13, 2025 Javice motion to compel Frank website); Dkt. 212 (Jan. 16, 2025 Government opposition). The Government has not come into possession of the Frank website since that time, and the Court should deny this motion, as it did Javice's earlier motion for the Frank website. See United States v. Avenatti, No. 19-CR-374 (JMF), 2022 WL 457315, at *1 (S.D.N.Y. Feb. 15, 2022) ("[T]he Government's disclosure obligations extend only to evidence or information in the possession of the 'prosecution team' those involved in the prosecution at issue — and the Servers are not, and have never been, in the possession of the prosecution team.").

Second, Javice's motion is fundamentally puzzling, because Javice does have access to archived versions of Frank's website through the publicly accessible Internet Archive—examples of which Javice herself attaches to her motion. See, e.g., Dkt. 345, Ex. A-B. Indeed, the Internet Archive has been discussed during trial in live testimony and in the form of a stipulation entered into among the parties. See GX S10 (explaining the Internet Archive's Wayback Machine and entering into evidence two preserved copies of Frank's homepage on different dates); Tr. 1897 (Dr. Kapelner testifying to having refreshed his memory of the Frank website in advance of his testimony by reviewing the Wayback Machine), 2034-35 (Dr. Kapelner testifying to the same, including that the Internet Archive's copies of Frank's website are publicly accessible and he did not need J.P. Morgan's permission to view them). While it may be true that the Wayback Machine "only includes some pages from websites that are now shut down, not all pages," Tr. 2929 (Rachel Danko during cross examination by Javice), Javice fails to explain why any unavailable pages if, in fact, there are any unavailable pages—are relevant, let alone admissible, in this trial about the defendants' lies regarding the number of Frank's users, not regarding the content of any particular pages on Frank's website.

VII. **Amar's Motion To Admit Summary Charts**

On March 20, 2025, and after opposing the introduction of summary charts by the Government that highlighted, among other things, the frequency of the defendants' telephone communications, Amar moved for the first time for the admission of his own summary charts. Dkt. 346. Amar's four proposed summary charts purport to provide the very same frequency analysis that the Government was precluded from offering before the jury, while relying—unlike the Government—on evidence that has never been admitted at this trial. As the Court has acknowledged repeatedly in rejecting the defendants' efforts to admit evidence that it has prohibited the Government from introducing, "what's good for the goose is good for the gander." Tr. 2959-2960. Amar's four proposed summary charts are highly improper and

¹ To the extent Javice has since had discussions with counsel for J.P. Morgan regarding obtaining a copy of Frank's website, see Dkt. 345 at 4 ("both the government and JPMC have disclaimed possession"), the Government has not even been a party to those discussions. Simply put, the Government does not possess the Frank website. See also Dkt. 61 (Nov. 7, 2023 Order Regulating Proceedings) at 1 (denying defendant Javice's earlier motion to compel while finding that "JPMC, although the victim of defendants' alleged fraud, is not part of the government's prosecution team").

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argumentative and should be precluded in full. In the event the Court is inclined to admit any of them, the Court should permit the Government to re-call Ms. Danko to admit the summary charts that the Government had previously offered showing the volume of telephone communications between Amar, Javice, and Glazer, as well as telephone communications between Amar and Javice.

Amar offers four summary charts that claim to summarize the number of emails sent or received by Amar, Javice, and Glazer with LionTree, Capital One, and JP Morgan Chase during different time periods in 2021. Each should be precluded. For one, and unlike the Government's summary charts, several of Amar's summary charts appear to summarize email correspondence that was never introduced as evidence at trial, including emails that have never been made part of the trial record. "A summary must of course be based on foundation testimony connecting it with the underlying evidence summarized . . . and must be 'based upon and fairly represent competent evidence already before the jury." United States v. Menendez, No. 23-CR-490 (SHS), 2024 WL 5103452, at *42 (S.D.N.Y. Dec. 13, 2024) (quoting Fagiola v. Nat'l Gypsum Co. AC & S., Inc., 906 F.2d 53, 57 (2d Cir. 1990)). Because Amar's charts violate this paradigmatic requirement of Federal Rule of Evidence 1006, they should be precluded on that basis alone.

Second, Amar's summary charts run afoul of the Court's rulings precluding Amar from arguing that his absence from emails or text messages—or the relative number of emails or text messages featuring other Frank executives, such as Matt Glazer—somehow function as evidence of Amar's innocence. As the Court has correctly held throughout this trial, it is irrelevant whether Javice is on more emails than Amar, or whether Glazer is copied on correspondence that Amar was not privy to. What matters is evidence that Amar knowingly deceived potential buyers of his and Javice's company. Amar's proposed summary witness appears poised to testify that these charts were created not from emails admitted in the record, but from the witness's review of email correspondence never offered or admitted into evidence—essentially, the witness's review of Amar's entire inbox. That evidence would not be permissible in document form. It is certainly not permissible in summary form. The Court should not permit Amar to present summary witness testimony premised on this inadmissible inference, either in testimony or summary chart form.

Respectfully submitted,

MATTHEW PODOLSKY Acting United States Attorney

By:

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Exhibit A

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 176	Date Range: 3/26/2021 - 3/27/2021

Outline of Conversations



Messages in chronological order (times are shown in GMT +00:00)

20 Pe	D01DAQKS4MN - 2021/03/26	
TC	Hi 📆	3/26/2021, 4:28 PM
TC	we just finished the deploy	3/26/2021, 4:28 PM
TW	<tif. withfrank.org=""> of tcpa?</tif.>	3/26/2021, 4:45 PM
TC	sorry I spoke too soon	3/26/2021, 4:45 PM
TC	let you know when we are done	3/26/2021, 4:45 PM
TC	but yes of tcpa	3/26/2021, 4:45 PM
TW	<pre></pre>	3/26/2021, 4:51 PM
TC	In just a min	3/26/2021, 4:52 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 4:53 PM
TC	Hi 📆	3/26/2021, 6:46 PM
TC	<	3/26/2021, 6:47 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 6:47 PM
TC	wondering if you may be able to help	3/26/2021, 6:47 PM
TW	<pre>Cokie</pre>	3/26/2021, 6:47 PM
TW	<pre> <tif. withfrank.org=""> What do you need from me? </tif.></pre>	3/26/2021, 6:47 PM
TC	need to find all users who have submitted applications in the past	3/26/2021, 6:48 PM
TC	then gather which devices, browsers, and OSs were used	3/26/2021, 6:48 PM

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TC	is this something that can be done in mixpanel or GA?	3/26/2021, 6:48 PM
TW	It must be a mixture?	3/26/2021, 6:49 PM
TC	yeah or 1 at a time	3/26/2021, 6:49 PM
TW	What is the date range	3/26/2021, 6:49 PM
TC	as far as you can go	3/26/2021, 6:49 PM
TW	Uhhhhhhkk	3/26/2021, 6:49 PM
TC	withfrank.org> the goal is to be able to say these are all the devices, browsers, and OSs that frank applications is submitted from	3/26/2021, 6:50 PM nave been successfully
TC	aka "are supported"	3/26/2021, 6:50 PM
TW	withfrank.org>	3/26/2021, 6:51 PM
TW	i'm laughing bc this is really painful and really real	3/26/2021, 6:51 PM
TW	withfrank.org>	3/26/2021, 6:51 PM
TC	ok np	3/26/2021, 6:52 PM
TC		3/26/2021, 6:52 PM
TW	withfrank.org> https://docs.google.com/spreadsheets/d/10xT4vNL7IYZYwimDpWFAxwbMzhPASbrfFa5q-dWO	3/26/2021, 6:53 PM KEA/edit#gid=0>
TW	i just shared this with you	3/26/2021, 6:53 PM
TW	it	3/26/2021, 6:53 PM
TW	i wanted to die this morning bc i worked on row 18 and below on the monthly tab for 2 full hours	3/26/2021, 6:54 PM
TW	then was told to stop	3/26/2021, 6:54 PM
TC	wow I don't even know what it means	3/26/2021, 6:55 PM

TW	<pre><tif.equiv withfrank.org=""> <https: 1sc3v8wlilfmj9lbv53vv4vxz0wljb68rh3lbfxqtbhi="" d="" docs.google.com="" edit#<="" pre="" spreadsheets=""></https:></tif.equiv></pre>	3/26/2021, 6:56 PM #gid=675513350>
TW	<tif. withfrank.org=""> this sheet is also the bane of my existence now bc ike used to do it and i had to add a whole buknow to get sign ups and submissions</tif.>	3/26/2021, 6:56 PM nch of goals i dont
TW	<tif. withfrank.org=""> for 2017 - 2018</tif.>	3/26/2021, 6:56 PM
TW	<pre><tif. withfrank.org=""> this is a long way of saying i dont know</tif.></pre>	3/26/2021, 6:57 PM
TW	<pre><tifwithfrank.org> bc i tried to search mixpanel for 2017 - date yesterday for the same sign up and submission numb wrong</tifwithfrank.org></pre>	3/26/2021, 6:57 PM ers and was told its
TW	<pre><tif< th=""><th>3/26/2021, 6:58 PM</th></tif<></pre>	3/26/2021, 6:58 PM
TC	ok well I was poking around in mixpanel	3/26/2021, 6:58 PM
TC	and saw that you can create "insights"	3/26/2021, 6:58 PM
TC	which sounds a lot like what I'm looking for	3/26/2021, 6:58 PM
TW	<pre><https: #="" _u.date00="20170301&_u.date01=20210325&goalOption=8/[https://analytics.google.com/analytics/web/#/report/visitors-" a86457897w136948712p141190613="" a86457897w136948712p14119[]&_u.date01="20210325&useg=builtin1&am</pre" analytics="" analytics.google.com="" browser="" report="" visitors-="" web=""></https:></pre>	
TW	except goal 8 hasnt always been the goal for submissions	3/26/2021, 7:00 PM
TC	I don't think I have access to	3/26/2021, 7:00 PM
TC	GA withfrank.org>	3/26/2021, 7:00 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 7:00 PM
TC	are you able to give me access to it?	3/26/2021, 7:01 PM
TC	it says account setup when I go to the link	3/26/2021, 7:01 PM
TC	do I maybe just need to setup an account?	3/26/2021, 7:01 PM

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TC	or just stick with mixpanel for now	3/26/2021, 7:02 PM
TW	<pre>ctif. withfrank.org> i unfortunately am not the person that can give access</pre>	3/26/2021, 7:02 PM
TW	<tif. withfrank.org=""> its olivier</tif.>	3/26/2021, 7:02 PM
TC	ok that's np	3/26/2021, 7:02 PM
TC	it will be a last resort	3/26/2021, 7:03 PM
TW	<pre><tif. withfrank.org=""> i did send you an email to see if you could get the export of this view</tif.></pre>	3/26/2021, 7:03 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 7:03 PM
	## 10 Co 10	
TW	mar 1 2017 - mar 25 2021	3/26/2021, 7:04 PM
TC	ok yes I got it	3/26/2021, 7:04 PM
TW	<pre><tif< th=""><th>3/26/2021, 7:04 PM</th></tif<></pre>	3/26/2021, 7:04 PM
TW	<pre>ctif. withfrank.org> bc prior to my time i have no idea what goals were used for which months</pre>	3/26/2021, 7:05 PM
TW	i know it has been goal 6, 8, and 9 (sum)	3/26/2021, 7:05 PM
TW	<pre><tifwithfrank.org> and then last year for sometime goal 8 was down so i switched to mixpanel and used fafsaapplication_primary_complete</tifwithfrank.org></pre>	3/26/2021, 7:05 PM
TW	<tif. withfrank.org=""> like in may of 2020</tif.>	3/26/2021, 7:06 PM
TC	what is a goal?	3/26/2021, 7:06 PM
TC	withfrank.org target to reach?	3/26/2021, 7:07 PM

TW	<pre><tif. withfrank.org=""> a goal is set by either a virtualpage url</tif.></pre>	3/26/2021, 7:07 PM
TW	<pre><tif.equiv withfrank.org=""> or a goal is set as a custom event (i.e. accountphone_validated)</tif.equiv></pre>	3/26/2021, 7:07 PM
TW	<tif. withfrank.org=""> it is a count</tif.>	3/26/2021, 7:07 PM
TC	<pre>withfrank.org> ok</pre>	3/26/2021, 7:07 PM
TW	<pre><tif. withfrank.org=""> a count tracker of how many times a particular event was reached</tif.></pre>	3/26/2021, 7:07 PM
TW	<tif. withfrank.org=""> = goal</tif.>	3/26/2021, 7:08 PM
TC	`fafsa_application_primary_complete` that makes sense to me	3/26/2021, 7:08 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 7:08 PM
TC	was just implemented last May?	3/26/2021, 7:08 PM
TW	mmmmm around march/april?	3/26/2021, 7:08 PM
TC	ok and what was used before to track the same event?	3/26/2021, 7:08 PM
TC	you know what	3/26/2021, 7:09 PM
TC	this may be a good start	3/26/2021, 7:09 PM
TW	<pre><https: 1662913="" 698907="" app="" insights#~(columnwidths~(bar~())~displayoptions~(c[]e~(~'2020-03-01~'2020-06-06))))~legend~()))<="" insights#~(columnwidths~(bar~())~displayoptions~(charttype="" mixpanel.com="" pre="" project="" view="" ~'line~plotstyle~'standard~analysis~'linear~value~'absolute)~sorting~(bar~(sortby~'column~colsortattrs~(~(sortby~'value~sortorder~'desc)))~line~(sortby~'value~sortorder~'desc)~table~(sortby~'column~colsortattrs~(~(sortby~'label~sortorder~'asc))))~timecomparison~null~title~'~querysamplingenabled~false~sections~(show~(~(dataset~'!mixpanel~value~(name~'account_phone_validated~resourcetype~'events)~resourcetype~'events~profiletype~null~search~'~datagroupld~null~math~'unique~peruseraggregation~null~property~null)~(dataset~'!mixpanel~value~(id~966373~custom~true~name~'student*20sub*20or*20ty~resourcetype~'events)~resourcetype~'events~profiletype~null~search~'~datagroupld~null~math~'unique~peruseraggregation~null~property~null)~(dataset~'!mixpanel~value~(name~'fafsa_application_primary_complete~resourcetype~'events)~resourcetype~'events~profiletype~null~search~'~datagroupld~null~math~'unique~peruseraggregation~null~property~vents~profiletype~null~search~'~datagroupld~null~math~'unique~peruseraggregation~null~property~lull))~time~(~(daterangetype~'between~unit~'day~value~(~'2020-03-01~'2020-06-06))))~legend~()) https:=""></https:></pre>	
TW	<tif. withfrank.org=""> this makes the most sense to me</tif.>	3/26/2021, 7:09 PM

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TW	everything prior to 2020 i'm really at a loss for	3/26/2021, 7:10 PM
TW	<pre><tif. withfrank.org=""> are you able to see the mixpanel link?</tif.></pre>	3/26/2021, 7:10 PM
TC	yes	3/26/2021, 7:11 PM
TW	<pre><tif< th=""><td>3/26/2021, 7:11 PM</td></tif<></pre>	3/26/2021, 7:11 PM
TW	<pre><tif< th=""><td>3/26/2021, 7:11 PM</td></tif<></pre>	3/26/2021, 7:11 PM
TC	no it is helpful just to see how that might work	3/26/2021, 7:12 PM
TC	withfrank.org> the only thing left there is to then be able to see the corresponding browsers	3/26/2021, 7:13 PM
TW	<pre><tif< th=""><td>3/26/2021, 7:14 PM</td></tif<></pre>	3/26/2021, 7:14 PM
TW	<pre><tifwithfrank.org> it'll be part of the picture?</tifwithfrank.org></pre>	3/26/2021, 7:16 PM
TC	ok I'll see if I can put it together	3/26/2021, 7:17 PM
TW	<tif. withfrank.org=""> ii'm sorry man!</tif.>	3/26/2021, 7:17 PM
TC	withfrank.org> no way!	3/26/2021, 7:17 PM
TC	not at all	3/26/2021, 7:17 PM
TC	thank you!	3/26/2021, 7:17 PM
TC	this definitely helps	3/26/2021, 7:17 PM
TW	<pre><tif.equiv withfrank.org=""> at least we have the tracking in place now!</tif.equiv></pre>	3/26/2021, 7:17 PM
TC	yep! withfrank.org>	3/26/2021, 7:17 PM
TC	I was able to get access to GA from Olivier	3/26/2021, 7:41 PM





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TW	<pre>f</pre>		3/26/2021, 7:46 PM
TC	withfrank.org> was going to share my screen		3/26/2021, 7:46 PM
TW	<pre>tif. withfrank.org> hangout?</pre>		3/26/2021, 7:46 PM
TC	withfrank.org>		3/26/2021, 7:47 PM
TW	<pre>comp audio on my comp doesnt work</pre>		3/26/2021, 7:47 PM
TC	withfrank.org> that's fine I can just slack		3/26/2021, 7:47 PM
TW	<tif. withfrank.org=""></tif.>		3/26/2021, 7:47 PM
TW	<pre><tif< td=""><td></td><td>3/26/2021, 7:47 PM</td></tif<></pre>		3/26/2021, 7:47 PM
TW	<pre>ctif. withfrank.org> bc i dial in</pre>		3/26/2021, 7:47 PM
TC	<pre>withfrank.org> <https: meet.google.com="" nrm-vwnq-bef=""> Meet</https:></pre>		3/26/2021, 7:47 PM
TC	withfrank.org>		3/26/2021, 7:47 PM
TW	<pre><tif. withfrank.org=""> i'm going to go eat?</tif.></pre>		3/26/2021, 8:54 PM
TW	<pre>vitf. withfrank.org> ping me when tcpa is ready for me to check?</pre>		3/26/2021, 8:54 PM
TW	<pre><tif< td=""><td></td><td>3/26/2021, 8:54 PM</td></tif<></pre>		3/26/2021, 8:54 PM
ТС	withfrank.org>		3/26/2021, 8:54 PM
TW	<pre><tif. withfrank.org=""> oh</tif.></pre>		3/26/2021, 8:54 PM
TW	stif. withfrank.org>		3/26/2021, 8:54 PM
TC	withfrank.org>		3/26/2021, 8:54 PM

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TW	<tif. withfrank.org=""></tif.>			3/26/2021, 9:00 PM
TW	<pre><tif. withfrank.org=""> are you sure match page is on?</tif.></pre>			3/26/2021, 9:00 PM
TC	what is match page?			3/26/2021, 9:00 PM
TW	<pre><tif< th=""><th></th><th></th><th>3/26/2021, 9:00 PM</th></tif<></pre>			3/26/2021, 9:00 PM
TC	where do you turn it on from?			3/26/2021, 9:01 PM
TC	withfrank.org>			3/26/2021, 9:01 PM
TC	yes that is enabled			3/26/2021, 9:01 PM
TW	<pre><tif< th=""><th>is supposed to be on</th><th></th><th>3/26/2021, 9:01 PM</th></tif<></pre>	is supposed to be on		3/26/2021, 9:01 PM
TW	<tif. withfrank.org=""></tif.>			3/26/2021, 9:01 PM
TW	<pre><tifwithfrank.org> <http: apply.withfrank.org="" pre="" signup apply.<=""></http:></tifwithfrank.org></pre>	withfrank.org/signup>?		3/26/2021, 9:01 PM
TW	<pre><tif. withfrank.org=""> is missing rec summary page entirely</tif.></pre>			3/26/2021, 9:02 PM
TC	ok I will double check that though			3/26/2021, 9:02 PM
TW	<pre><tif. withfrank.org=""> <https: -="" 1662913="" access="" analytics<="" mixpanel="" mixpanel.com="" pre="" product="" project="" s="" =""></https:></tif.></pre>	view/698907/app/profilea	#distinct_id=408759095	3/26/2021, 9:02 PM 6523985943&> Request
TW	<pre><tif< th=""><th></th><th></th><th>3/26/2021, 9:02 PM</th></tif<></pre>			3/26/2021, 9:02 PM
TW	<tif. withfrank.org=""> straight from profile address page to fafs</tif.>	sa		3/26/2021, 9:02 PM
TC	withfrank.org> the only time you don't get recs is if you			3/26/2021, 9:04 PM
TW	<pre><tif. withfrank.org=""> i was under 22</tif.></pre>			3/26/2021, 9:04 PM
TC	withfrank.org> if you select an age over 22 for example			3/26/2021, 9:04 PM
TW	<pre><tif. withfrank.org=""> ACT people should see recs no?</tif.></pre>			3/26/2021, 9:04 PM

TC	yes they should	3/26/2021, 9:05 PM
TC	withfrank.org> that's the issue we are ironing out	3/26/2021, 9:05 PM
TW	<pre><tif.< pre=""> withfrank.org> oh</tif.<></pre>	3/26/2021, 9:05 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 9:05 PM
TW	<pre><tif.com withfrank.org=""> i misunderstood</tif.com></pre>	3/26/2021, 9:05 PM
TW	<pre><tifwithfrank.org> i thought tcpa for act was up</tifwithfrank.org></pre>	3/26/2021, 9:05 PM
TC	no problem!	3/26/2021, 9:06 PM
TC	yeah the code is deployed	3/26/2021, 9:06 PM
TC	but basically we are dealing with a DB issue	3/26/2021, 9:06 PM
TC	withfrank.org> so as soon as that if resolved then we should see ACT recs with TCPA in place	3/26/2021, 9:06 PM
TW	<pre>ctif. withfrank.org> gotcha</pre>	3/26/2021, 9:06 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 9:06 PM
TW	<tif. withfrank.org=""> would you be able to let me know when that happens later? i'll check again in gtm analytics and m happens!</tif.>	3/26/2021, 9:07 PM ixpanel when that
TC	absolutely!	3/26/2021, 9:07 PM
TW	<pre>clip < tif. withfrank.org> really appreciate it!</pre>	3/26/2021, 9:07 PM
TW	<tif. withfrank.org=""> NOW i will go eat</tif.>	3/26/2021, 9:07 PM
TW	<tif. withfrank.org=""></tif.>	3/26/2021, 9:07 PM
TW	<tif. withfrank.org=""> womp</tif.>	3/26/2021, 9:07 PM

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TC	withfrank.org> np enjoy!		3/26/2021, 9:08 PM
TC	ok TCPA is working in production		3/27/2021, 12:09 AM
TC	< withfrank.org>		3/27/2021, 12:09 AM
TW	Okie withfrank.org>		3/27/2021, 12:09 AM
TC	withfrank.org>		3/27/2021, 12:09 AM

https://mixpanel.com/project/1662913/view/698907/app/profile#distinct_id=8983180126805441205& Request Access - Mixpanel | Product Analytics